

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF AIKEN)	
Teresa Tyler Altman,)	
)	
Plaintiff,)	
)	SUMMONS
v.)	(JURY TRIAL DEMANDED)
)	Case No: 2022-CP-02-_____
Edward Blaine Lobb,)	
)	
Defendant.)	

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the Plaintiff or her attorney(s), Wilson Law Group, LLC, at P.O. Box 1150 (3056 Railroad Avenue), Bamberg, South Carolina, 29003, within thirty (30) days after service hereof, exclusive of the day of such service; and, if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

By: s/J. Christopher Wilson
 J. Christopher Wilson, SC Bar #06987
 Wilson Law Group, LLC
 P.O. Box 1150
 Bamberg, SC 29003
 Telephone: (803) 245-7799
 Fax: (803) 245-0037

August 16, 2022
 Bamberg, SC

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF AIKEN)	
Teresa Tyler Altman,)	
)	
Plaintiff,)	
)	COMPLAINT
v.)	(JURY TRIAL DEMANDED)
)	Case No: 2022-CP-02-_____
Edward Blaine Lobb,)	
)	
Defendant.)	

Plaintiff would respectfully allege and show unto the Court:

1. Plaintiff is a citizen and resident of the County of Aiken, State of South Carolina.
2. Defendant, upon information and belief, is a citizen and resident of the County of Aiken, State of South Carolina.
3. At all times mentioned herein, Old Barnwell Road generally runs in a north/south direction located in the County of Aiken, State of South Carolina.
4. This Court has jurisdiction over the parties and the subject matter of this action.
5. On October 12, 2021, the Plaintiff and Defendant were traveling South on Silver Bluff Road.
6. Plaintiff was attempting to properly and lawfully pass Defendant when, suddenly and without warning, Defendant attempted to make a left turn onto a private driveway and improperly and unlawfully turned in front of Plaintiff, causing Plaintiff to strike Defendant's vehicle. Said action of Defendant caused Plaintiff to be thrown in and about the interior of her vehicle.

7. That as a result of the aforesaid, Plaintiff suffered severe bodily injuries and was given emergency medical treatment. She received additional medical care and treatment during her recovery.

8. That the wreck and resulting injuries to the Plaintiff occurred as a direct and proximate result of the negligent, careless, reckless, willful, and wanton acts and delicts of Defendant in the following particulars, to wit:

- (a) In failing to maintain a proper lookout;
- (b) In failing to maintain proper control of the vehicle;
- (c) In operating the vehicle in an unlawful and reckless manner;
- (d) In failing to yield the right-of-way;
- (e) In making an improper left turn;
- (f) In operating the vehicle on the highway without due regard for the rights of others, especially the Plaintiff;
- (g) In operating the vehicle with defective brakes or, if said brakes were not defective, in failing to apply the same in time to avoid a collision;
- (h) In failing to exercise due care under the circumstances then and there prevailing to avoid injury and damage to others, especially the Plaintiff herein; and,
- (i) In such other particulars as may be shown at trial.

That the above acts and omissions were the direct and proximate cause of the injuries and damages sustained by the Plaintiff herein, the said acts and omissions being in violation of the common and statutory law of the state of South Carolina and such other law as may apply.

9. As the direct and proximate cause of the aforesaid negligence, carelessness, recklessness,

willfulness, and wantonness of the defendant, the plaintiff was thrown in and about the interior of the vehicle, causing her to sustain injuries including pain and suffering, past, present and future; causing her to incur medical expenses, past, present and future; causing her shock, embarrassment, and mental distress, past, present and future; causing Plaintiff to suffer lost wages, past, present and future; all to the plaintiff's actual and punitive damages in an amount to be determined by the triers of the facts.

WHEREFORE, Plaintiff respectfully prays for judgment against the Defendant for all actual damages, special damages, consequential damages, and punitive damages in an amount to be determined by the jury at the trial of this action, the costs and disbursements of this action and for such other and further relief as this court deems just and proper.

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